

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

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Civil Action No. 03 MDL 1570 (GBD) (SN)
ECF Case

This document relates to:

All Cases

DECLARATION OF ANDREW C. SHEN

I, Andrew C. Shen, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that:

1. I am an attorney with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. (“Kellogg Hansen”) and represent Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) in this litigation. I am admitted to practice in this Court.

2. On April 28, 2022, a Kellogg Hansen assistant working under my direction entered “<https://911documentarchive.com/documents>” into their web browser. The browser opened to the “Documents” page of the website, “9/11 Document Archive.” From that page, one could access 346 files, including scanned documents, scanned photographs, and audio and video recordings. The Kellogg Hansen assistant downloaded copies of the 346 files and saved them to Kellogg Hansen’s internal server.

3. I have reviewed a selection of the 346 files. Based on my initial review, the files contain Omar Al Bayoumi’s sensitive personal information, including financial and banking information, identification materials, and personal contact information. The files also contain home videos and photographs depicting Mr. Al Bayoumi and his family, including photographs of Mr. Al Bayoumi and his wife in the hospital for the birth of their daughter.

4. Based on my initial review, it appears that some of the photographs and home videos have been redacted or edited to exclude depictions of Mr. Al Bayoumi's then-minor children. However, I located at least one home video among the 346 files that depicts Mr. Al Bayoumi's then-minor children.

5. Attached as Exhibit A is a true and correct copy of the April 1, 2022, 7:32 pm ET email from Megan Benett to myself, Michael K. Kellogg, Gregory G. Rapawy, Robert Kry, and Eric Nitz, providing the materials produced by the United Kingdom's Metropolitan Police Service to the Plaintiffs' Executive Committees in response to the Court's June 9, 2021 Letter of Request for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on Taking of Evidence Abroad in Civil or Commercial Matters.

6. Attached as Exhibit B is a true and correct copy of the "Home" page of the website, "9/11 Document Archive," as it appeared on April 28, 2022 at 11:47 am ET.

- a. On April 28, 2022, a Kellogg Hansen assistant working under my direction entered "<https://911documentarchive.com>" into their web browser.
- b. The browser opened to the "Home" page of the website, "9/11 Document Archive." The Kellogg Hansen assistant created a pdf of that page and sent it to me. Exhibit B is a true and correct copy of the pdf that I received.

7. Attached as Exhibit C is a true and correct copy of the "Contact" page of the website, "9/11 Document Archive," as it appeared on April 28, 2022 at 11:48 am ET.

- a. On April 28, 2022, a Kellogg Hansen assistant working under my direction entered “<https://911documentarchive.com/contact>” into their web browser.
- b. The browser opened to the “Contact” page of the website, “9/11 Document Archive.” The Kellogg Hansen assistant created a pdf of that page and sent it to me. Exhibit C is a true and correct copy of the pdf that I received.

8. Attached as Exhibit D is a true and correct copy of an April 27, 2022 press release titled, “Trove of 9/11 Evidence Seized by U.K. Police in 2001 Now Made Public,” as it appeared on the website of Kreindler & Kreindler LLP on April 29, 2022 at 6:00 am ET.

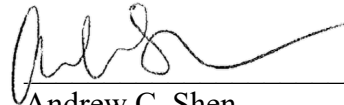
- a. On April 29, 2022, a Kellogg Hansen attorney working under my direction entered “<https://www.kreindler.com/news/trove-of-911-evidence-seized-by-uk-police-in-2001-now-made-public>” into their web browser.
- b. The browser opened to a page on the website of Kreindler & Kreindler LLP titled, “Trove of 9/11 Evidence Seized by U.K. Police in 2001 Now Made Public.” The Kellogg Hansen attorney created a pdf of that page and sent it to me. Exhibit D is a true and correct copy of the pdf that I received.

9. Attached as Exhibit E is a true and correct copy of the email chain between myself and Gavin Simpson regarding the publication by Kreindler & Kreindler LLP of the materials that the Plaintiffs’ Executive Committees received from the United Kingdom’s Metropolitan Police Service in response to the Court’s June 9, 2021 Letter of Request for

International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on Taking of Evidence Abroad in Civil or Commercial Matters.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 4, 2022



Andrew C. Shen